

GARG GOLDEN LAW FIRM
ANTHONY B. GOLDEN, ESQ.
Nevada Bar No. 9563
PUNEET K. GARG, ESQ.
Nevada Bar No. 9811
3185 St. Rose Parkway, Suite 325
Henderson, Nevada 89052
Tel: (702) 850-0202
Fax: (702) 850-0204
Email: agolden@garggolden.com

Counsel for Defendants Vegas Affordable Stone and Tile, Inc.,
Stone Consulting, LLC, and Jedediah Michael Feller

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRUSTEES OF THE BRICKLAYERS &
ALLIED CRAFTWORKERS LOCAL 13
DEFINED CONTRIBUTION PENSION TRUST
FOR SOUTHERN NEVADA; TRUSTEES OF
THE BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 HEALTH
BENEFITS FUND; TRUSTEES OF THE
BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 VACATION
FUND; BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 NEVADA;
TRUSTEES OF THE BRICKLAYERS &
TROWEL TRADES INTERNATIONAL
PENSION FUND; TRUSTEES OF THE
BRICKLAYERS & TROWEL TRADES
INTERNATIONAL HEALTH FUND; and
TRUSTEES OF THE INTERNATIONAL
MASONRY INSTITUTE,

Plaintiffs,

vs.

COMMERCIAL UNION TILE & STONE, INC.,
a Nevada corporation; VEGAS AFFORDABLE
STONE AND TILE, INC., a Nevada corporation;
STONE CONSULTING, LLC, a Nevada limited
liability company; JONATHAN WILLIAM
CANJA, individually; and JEDEDIAH
MICHAEL FELLER, individually,

Defendants.

CASE NO.: 2:15-cv-02129-APG-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE RESPONSES
TO PENDING MOTIONS FOR
SUMMARY JUDGMENT**

(SECOND REQUEST)

1 The parties to this action, by and through their undersigned counsel, stipulate and agree to
2 further extend the deadline to file responses to the following pending motions for summary
3 judgment from January 13, 2017 to February 13, 2017:

4 Defendant Jedediah Feller's Motion for Summary Judgment (dkt. # 53);

5 Plaintiffs' Motion for Summary Judgment (dkt. # 54);

6 Defendant Vegas Affordable Stone and Tile, Inc.'s Motion for Summary Judgment (dkt. #
7 55);

8 Defendant Stone Consulting, LLC's Motion for Summary Judgment (dkt. # 56);

9 This is the second request for an extension of time for these deadlines, and the request is
10 not made for the purpose of delay. The parties have been diligently discussing a resolution to this
11 matter and have made substantial progress in that regard. The parties submit that good cause
12 appears for the extension, and continue to wish to dedicate time and resources to a resolution
13 without incurring additional litigation expense. The parties expect this to be their last request for

14 ///

28 ///

such an extension in this matter.

Dated this 11th day of January, 2017.

GARG GOLDEN LAW FIRM

THE URBAN LAW FIRM

By /s/ Anthony B. Golden
Anthony B. Golden, Esq.
3185 St. Rose Parkway, Suite 325
Henderson, Nevada 89052
(702) 850-0202
*Counsel for Vegas Affordable Stone and
Tile, Inc., Stone Consulting, LLC, and
Jedediah Michael Feller*

By /s/ Nathan R. Ring
Michael A. Urban, Esq.
Nathan R. Ring, Esq.
4270 S. Decatur Blvd., Suite A-9
(702) 968-8087
Counsel for Plaintiffs

AQUINO LAW GROUP, LTD.

By /s/ Aaron A. Aquino
Aaron A. Aquino, Esq.
5150 W. Spring Mountain Rd., #12
Las Vegas, Nevada 89146
(702) 871-6464
*Counsel for Commercial Union Tile &
Stone, Inc. and Jon Canja*

ORDER

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

January 11, 2017
DATED: _____